EXHIBIT A

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

RUSSIAN ENERGY ADVISORS, L.L.C.,

Plaintiff,

Case No. 4:06-cv-03990

ATLAS PETROLEUM
INTERNATIONAL LIMITED, et al.

V.

Defendants.

DECLARATION OF DEWILL "DOUGLAS" DAWN, III

- 1. Dewill "Douglas" Dawn, III, make this Declaration in connection with the Defendants' Motion to Dismiss for *Forum Non Conveniens* and, based on my personal knowledge, state as follows:
- 1. I am over the age of eighteen. I reside and work in Nigeria. I also maintain a residence in Alabama. In a typical year, I spend tess than one month at my residence in Alabama. I am the Director of Operations for Triax Airlines.
- In May 2005, I traveled to Texas with the Chairman of Oranto, Mr. Arthur Eze. The purpose of the trip included an inspection of an airplane located in Texas for possible purchase by Triax Airlines. During this trip, I introduced Mr. Eze to Michele Miller, a lawyer with whom I had worked to set up my company, DMJ Aviation International, L.L.C. I was aware that Ms. Miller had an interest in the oil and gas industry. Ms. Miller knew of my association with Arthur Eze and, in a general way, his business. At Ms. Miller's request, I introduced her to Mr. Eze. She described herself to Mr. Eze as a consultant engaged in the business of assisting in the procurement of oil and gas transactions with Russian companies.

- 3. Ms. Miller, Mr. Eze and I had dinner together in Houston. The dinner was social in that we did not discuss business at the dinner, other than initial discussion of our professions. We were joined at dinner by two associates of Mr. Eze who were traveling with him, namely Chukwuma Eze. Production Manager for Atlas, and Chika Nnamdi Eneanya, Business Development Manager for Oranto. It is my understanding that both reside in Nigeria.
- 4. Ms. Miller later contacted me to obtain Mr. Arthur Eze*s contact information in Nigeria and London, which I provided. Subsequently, at Ms. Miller's request, I arranged for Ms. Miller to meet with him in London.
- 5. I attended the London meeting between Ms. Miller and Mr. Eze. Mr. Chukwuma Eze was also briefly in attendance. At the meeting, held over lunch at a restaurant in London. Ms. Miller and Mr. Arthur Eze discussed a possible business arrangement with Russian Energy Advisors, L.L.C. relating to the marketing of various oil and gas licenses held by two Nigerian companies. Atlas Petroleum International Limited ("Atlas") and Oranto, to the Lukoil Energy company involved in Lukoil's development activities in Africa.
- 6. The luncheon discussion was conceptual. It did not include specific petroleum properties of either Oranto or Atlas, nor did it include a discussion of the terms on which Ms. Miller was proposing to act for Oranto and Atlas. The meeting was brief and no agreement was made at that time.
- 7. As I am often in London, England on the business of Triax Airlines, it would not be inconvenient for me to appear to testify in court proceedings in London concerning the matters at issue in the litigation between Russian Energy Advisors, L.L.C. and Oranto, Atlas and Mr. Eze. In fact, I would be willing to make myself available to appear in court proceedings in London, England regarding this matter.

Mr. Eze. In fact, I would be willing to make myself available to appear in court proceedings in London, England regarding this matter.

I solemnly declare under the penalties of perjury under the laws of the United States that the statements in the foregoing Declaration are true.

Subscribed this 20 day of February 2007 at Laugue, Migaria.

Dewill "Douglas" Dawn, II